

**EXHIBIT 22**

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

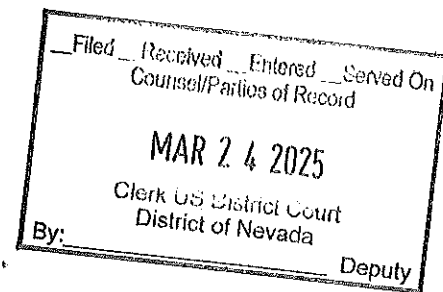
**DREW J. RIBAR, Pro Se Plaintiff**

3480 Pershing Ln

Washoe Valley, NV 89704

(775) 223-7899

Const2Audit@gmail.com



**vs.**

**WASHOE COUNTY, et al.**

**Defendants.**

Case No.: **3:24-cv-00526-ART-CLB**

**EXHIBIT 22**

**Title:** Email Correspondence Regarding Public Records Requests, Open Meeting Law

Violations, and Due Process Concerns for August 21, 2024 Library Board Hearing

- **Date:** August 16, 2024
- **Source:** Internal email correspondence between Plaintiff Drew Ribar, Washoe County Library Director Jeff Scott, Washoe County Deputy District Attorney Herbert Kaplan, and Library Board of Trustees Members
- **Bates Number Range:** EXH165-EXH178

## **DESCRIPTION & LEGAL RELEVANCE**

This exhibit contains email correspondence confirming **violations of due process, public records obstruction, and First Amendment retaliation** against Plaintiff by Washoe County officials, including:

### **1. Failure to Provide Public Records in Violation of Nevada Law (NRS 239)**

- Plaintiff repeatedly requested critical documents, including emails, video footage, and all evidence supporting the claims against him.
- Washoe County failed to produce these records, violating NRS 239 (Nevada Public Records Act) and constitutional due process rights under the Fourteenth Amendment (*Mathews v. Eldridge*, 424 U.S. 319 (1976)).

### **2. Obstruction of Due Process Rights in Suspension Appeal Hearing**

- Emails confirm Plaintiff was not provided with adequate discovery, including the identity of his accuser.
- Washoe County officials imposed arbitrary and prejudicial hearing restrictions that denied Plaintiff a fair appeal process.
- This constitutes a violation of procedural due process under *Armstrong v. D.C. Pub. Library*, 154 F. Supp. 2d 67 (D.D.C. 2001).

### **3. Violation of the Nevada Open Meeting Law (NRS 241.033)**

- The emails establish Washoe County's failure to provide timely notice and access to public records before the August 21, 2024 hearing.

- Under NRS 241.033, individuals facing government action **must be provided with sufficient notice and an opportunity to respond**, which did not occur.

#### 4. **First Amendment Retaliation – Social Media Censorship & Public Forum Violations**

- Plaintiff was **denied access to the Washoe County Library’s Facebook page**, violating **Packingham v. North Carolina, 582 U.S. 98 (2017)** and **Knight First Amendment Inst. v. Trump, 928 F.3d 226 (2d Cir. 2019)**.
- Washoe County engaged in **viewpoint discrimination**, selectively restricting Plaintiff’s speech while allowing other viewpoints to be expressed freely.

#### 5. **Evidence of Conspiracy & Monell Liability**

- Emails confirm **Washoe County and Build Our Center, Inc. coordinated to suppress public dissent**, making BOC a state actor under **Lugar v. Edmondson Oil Co., 457 U.S. 922 (1982)**.
- The obstruction of public records requests, coupled with the improper appeal hearing procedures, **supports a Monell claim (Monell v. Dept. of Social Services, 436 U.S. 658 (1978))** against Washoe County.

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### **CERTIFICATE OF AUTHENTICITY**

I, **Drew J. Ribar**, declare under penalty of perjury under the laws of the United States and the State of Nevada that:

1. The attached exhibit is a **true and correct copy** of email correspondence I obtained from my official records and communications with Washoe County officials.

1 2. These documents were received in the ordinary course of business and are submitted as  
2 **evidence of constitutional and statutory violations** in this matter.

3 3. This exhibit is provided in compliance with **Federal Rules of Evidence 901 and 902**  
4 regarding authentication of documentary evidence.  
5

6 Dated: **March 17, 2025**

7  
8 /s/ **Drew J. Ribar**

9 **Pro Se Plaintiff**

10 3480 Pershing Ln

11 Washoe Valley, NV 89704

12 (775) 223-7899

13 Const2Audit@gmail.com  
14  
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**From:** Const2Audit <const2audit@gmail.com>  
**Sent:** 16 August 2024 16:33  
**To:** Scott, Jeff  
**Cc:** Kaplan, Herbert; Solaro, David; Silver, Ann (Board member); Ruf, Tami (Trustee); Jacks, Gianna (Board Member); Moser, Lea (Trustee); fredmyer@gmail.com; V W; VWMEYER@gmail.com; Al Rogers (Trustee); sanshelly1@charter.net; rich@mlreno.com; Herman, Jeanne; Clark, Michael; Hill, Alexis; Garcia, Mariluz C.; Clara Andriola; Brown, Eric P.; Bob Conrad This Is Reno; reno misconduct; mrobison@rgj.com; Jhart@mynews4.com; bmargiott@mynews4.com; Nevada Signal; Nevada Liberty; Scott Neuffer; Audit the Audit; Robert Beadles; contact@thenvindy.com; editor@nevadaappeal.com; Alexis.Hansen@asm.state.nv.us; Ken.Gray@asm.state.nv.us; NV\_Media ACLUNV; megan@thenevadaglobe.com; PK.Oneill@asm.state.nv.us  
**Subject:** Re: Notice of Appeal - Library Board of Trustees - August 21, 2024  
**Attachments:**

**This Message Is From an External Sender**

This message came from outside of Washoe County — DO NOT CLICK on links or open attachments unless you are sure the content is safe.

[https://us-phishalarm-ewt.proofpoint.com/EWT/v1/KDQzAAmjIQ!4G4TesVSmpTZVijKIZj9LAac8TANsdc0GNM2uUhXxFSj-J4Vfkox-pXOZvokCTSqyeE8LoGab9Pty6sjGh24-0Jo6cqX6g8l1D1T0Tgxqdy2VBTZnHTPaSNJ0S9FN6Qjy6Uow\\$](https://us-phishalarm-ewt.proofpoint.com/EWT/v1/KDQzAAmjIQ!4G4TesVSmpTZVijKIZj9LAac8TANsdc0GNM2uUhXxFSj-J4Vfkox-pXOZvokCTSqyeE8LoGab9Pty6sjGh24-0Jo6cqX6g8l1D1T0Tgxqdy2VBTZnHTPaSNJ0S9FN6Qjy6Uow$)  
Report Suspicious </Div> </A>

**FRIDAY EDITION TWILIGHT ZONE: VIOLENT LIBRARIANS & TRANSEXUALS LOCKING CHILDREN IN LIBRARIES AND KEEPING THE PUBLIC OUT...**

NRS 379.120 Library to be free and accessible to public; regulations of governing authority. The library and reading room shall forever be and remain free and accessible to the people of the city, subject to such reasonable rules and regulations as the governing authority may adopt.

Mr Kaplan & Scott,

I was very specific about my Discovery / NRS 239 PUBLIC RECORDS REQUEST in previous emails. I can file a motion with the Court if you prefer to get this information and we can extend the hearing, causing me further damages. Or you can give me the information I need to defend myself against this violation of my Constitutional Rights and we can end this part of the process.

Why are you playing this stupid game of denying public records/discovery?

How is this DUE PROCESS??

EXH 165

The Executive Branch is the police/Assistant Library Director writing the citation, Judge/Assistant Library Director with no hearing, Appeals Court Judge/Library Director with no hearing and now I get to go before the library board as the Supreme Court in an Administrative Hearing with no discovery, no public records and you are going to make me fight to get discovery/public records?

Disclose the name of the library employee that accused me of injuring her.  
Is it the asian woman that slammed the door on my foot??  
As shown in this video... <https://youtube.com/shorts/2Ftp4suz450>

Provide all emails with my name in them.

Provide all records used to create the complaint and restrictions placed on me leading to this hearing.

Provide all records with Our Center or the corporate name Build Our Center and any of its volunteers or staff.

Provide all records regarding Drag Queen story time to include all video/audio, emails, invoices, insurance, costs, employee hours, documents, fliers, posters etc..

Seems to me, if you are ready for a hearing you should have all of this information readily available.

Why would you NOT want to put an end to this issue as quickly as possible??  
Why work so hard not to provide public records??  
What are you hiding??

Drew Ribar  
Auditing Reno 911  
775-223-7899

EXH 166

On Thu, Aug 15, 2024 at 10:22 AM Scott, Jeff <[jscott@washoecounty.gov](mailto:jscott@washoecounty.gov)> wrote:

Good morning,

The only documentation is what was already provided to Mr. Ribar when he was suspended. I will provide it again here.

Please let me know if you have any questions.

Thanks

Jeff

Jeff Scott  
Library Director | Washoe County Library System  
[jscott@washoecounty.gov](mailto:jscott@washoecounty.gov) | Office: 775.327.8340  
301 S. Center Street, Reno, NV 89501

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**From:** Kaplan, Herbert <[HKaplan@da.washoecounty.gov](mailto:HKaplan@da.washoecounty.gov)>  
**Sent:** Thursday, August 15, 2024 9:57:08 AM  
**To:** Const2Audit <[const2audit@gmail.com](mailto:const2audit@gmail.com)>  
**Cc:** Solaro, David <[DSolaro@washoecounty.gov](mailto:DSolaro@washoecounty.gov)>; Silver, Ann (Board member) <[ASilver@washoecounty.gov](mailto:ASilver@washoecounty.gov)>; Ruf, Tami (Trustee) <[TRuf@washoecounty.gov](mailto:TRuf@washoecounty.gov)>; Jacks, Gianna (Board Member) <[GJacks@washoecounty.gov](mailto:GJacks@washoecounty.gov)>; Moser, Lea (Trustee) <[L.Moser@washoecounty.gov](mailto:L.Moser@washoecounty.gov)>; [fredrmyer@gmail.com](mailto:fredrmyer@gmail.com)>  
<[fredrmyer@gmail.com](mailto:fredrmyer@gmail.com)> V W <[valeriealerie@gmail.com](mailto:valeriealerie@gmail.com)>;  
[VWMEYER@gmail.com](mailto:VWMEYER@gmail.com)> <[VWMEYER@gmail.com](mailto:VWMEYER@gmail.com)> Al Rogers (Trustee) <[sanshelly1@charter.net](mailto:sanshelly1@charter.net)>  
<[ARogers@washoecounty.gov](mailto:ARogers@washoecounty.gov)>;  
<[sanshelly1@charter.net](mailto:sanshelly1@charter.net)> <[rich@mlreno.com](mailto:rich@mlreno.com)> <[rich@mlreno.com](mailto:rich@mlreno.com)>; Scott, Jeff <[jscott@washoecounty.gov](mailto:jscott@washoecounty.gov)>  
**Subject:** RE: RE: Notice of Appeal - Library Board of Trustees - August 21, 2024

Mr. Ribar,

EXH 167

Thank you for your response.

I will ask Director Scott to provide you as soon as possible with whatever records are going to be presented to the Library Board in connection with the suspension and your subsequent appeal.

Based on your e-mail I will instruct staff to leave your appeal on the agenda for next week's meeting. However, if you feel the documentation has not been timely provided to allow you to respond, you can contact us to advise that you would like to have the matter postponed until such time as you have had that opportunity. In that event, the appeal would be pulled/tailed by the Chair at the meeting and your appeal would then be placed on a future agenda, likely the September 2024 meeting.

Thank you again for your response.

**Herbert Kaplan**

**Deputy District Attorney**

**Washoe County District Attorney**

[hkaplan@da.washoecounty.gov](mailto:hkaplan@da.washoecounty.gov)

Office: 775.337.5700

One S. Sierra St. 4<sup>th</sup> Floor, Reno, NV 89501

**Justice First, People Always**

[</A>](#) [</A>](#) [</A>](#) [</A>](#) [</A>](#) [</A>](#) [</A>](#)

CONFIDENTIAL: This e-mail, including any attachments, is intended only for the person or entity to which it is addressed. This e-mail may contain confidential information, proprietary information, and/or information which is protected by the attorney-client privilege or work product doctrine. The unauthorized review, use, forwarding, printing, copying, disclosure, or distribution of this e-mail is

EXH168



strictly prohibited. If you are not the intended recipient or have reason to believe you are not authorized to receive this e-mail, please promptly delete this message and notify the sender.

**From:** Const2Audit <const2audit@gmail.com>  
**Sent:** Thursday, August 15, 2024 9:33 AM  
**To:** Kaplan, Herbert <HKaplan@da.washoecounty.gov>  
**Cc:** Solaro, David <DSolaro@washoecounty.gov>; Herman, Jeanne <JHerman@washoecounty.gov>; Clark, Michael <MEClark@washoecounty.gov>; Hill, Alexis <AHill@washoecounty.gov>; Garcia, Mariluz C. <MCGarcia@washoecounty.gov>; Clara Andriola <CAndriola@washoecounty.gov>; Brown, Eric P. <EPriceBrown@washoecounty.gov>; Silver, Ann (Board member) <ASilver@washoecounty.gov>; Ruf, Tami (Trustee) <TRuf@washoecounty.gov>; Jacks, Gianna (Board Member) <GJacks@washoecounty.gov>; Moser, Lea (Trustee) <LMoser@washoecounty.gov>; Bob Conrad This Is Reno <bob@thisisreno.com>; reno misconduct <renomisconduct@gmail.com>; mrobison@rgi.com</A>; Jhart@mynews4.com</A>; Benjamin Margiott <bmargiott@mynews4.com>; Nevada Signal <nevadasignal@gmail.com>; Nevada Liberty <freedom@nevadaliberty.org>; Scott Neuffer <sneuffer@nevadaappeal.com>; fredrmyer@gmail.com</A>; V W <valeriealerie@gmail.com>; VWMEYER@gmail.com</A>; Audit the Audit <auditheaudit@gmail.com>; Robert Beadles <RobertBeadles@protonmail.com>; contact@thenwindy.com</A>; editor@nevadaappeal.com</A>; Alexis.Hansen@asm.state.nv.us</A>; Ken.Gray@asm.state.nv.us</A>; NV\_Media ACLUNV <media@aclunv.org>; megan@thenevadaglobe.com</A>; PK.Oneill@asm.state.nv.us</A>; Al Rogers (Trustee) <ARogers@washoecounty.gov>; sanshelly1@charter.net</A>; rich@mlreno.com</A>  
**Subject:** Re: RE: Notice of Appeal - Library Board of Trustees - August 21, 2024

Greetings!!

This fine Thursday August 15, 2024

Following up on The Twilight Zone Violent Librarians Transsexuals locking CHILDREN in libraries and keeping the public out saga...

EXH169

Mr. Kaplan,

Will you be able to get me the records in a timely manner so that I can review them prior to the August 21 Library Board meeting??

I am more than willing to resolve this issue expeditiously by waiving notice as long as I can review and have the information to defend myself and restore my Right to access the public library to do the only thing I have done in the library over the last 25 years... record, document and disseminate as a member of media exercising my 1st Amendment God given Right as a member of the free press.

I do not have a library card. Have not checked out a book. The only time I spend in the library is recording government employees doing their jobs. This restriction has chilled my speech and ability to follow up on a news story that is relevant to our community.

Did you know that Judge Derek Dreiling ruled I am a member of the media and allowed me to record his court?

Check this video out (if you don't want to watch Deputy Bueno whine, the order is issued about 49:00 into the video).

<https://youtu.be/OY5DhTJvgjo?si=VTyplxKa4G8hflW2</A>>

Please provide the records as soon as possible so you can get this item on the agenda and we can resolve this portion of the process.

The actions taken against me by Washoe County are First Amendment Retaliation. Nieves v Bartlett, 587 U.S. 391 &quot;To prevail on such a claim, a plaintiff must establish a causal connection between the government defendant's retaliatory animus and the plaintiff's subsequent injury. It is not enough to show that an official acted with a retaliatory motive and that the plaintiff was injured - the motive must cause the injury. Specifically, it must be a "but-for" cause, meaning that the adverse action against the plaintiff would not have been taken absent the retaliatory motive.&quot;

EXH 170

The only "retaliatory motive" to be restricted is because I document and disseminate. I use the library for no other purpose. The motive of Washoe County and its employees was to stop me from exercising my Rights and they injured me in the process when they shut the door on my foot, when Jeff Scott laid hands on me and trespassed me because my recording was upsetting people. Now I am restricted for a year because government employees do not want their actions published... causing further damages.

When will I be able to access the public forum on Washoe County Library Facebook again??

When will the information I requested be provided?

Respectfully,

Drew Ribar

Auditing Reno 911

775-223-7899

On Wed, Aug 14, 2024 at 10:31 AM Const2Audit <[const2audit@gmail.com](mailto:const2audit@gmail.com)> wrote:

Good morning!

Re: Twilight Zone Violent Librarians and Transexuals Locking CHILDREN In a Library keeping the public out...

EXH 171

**NRS 379.120 Library to be free and accessible to public; regulations of governing authority.** The library and reading room shall forever be and remain free and accessible to the people of the city, subject to such reasonable rules and regulations as the governing authority may adopt.

Mr. Kaplan,

I requested my attorney Rich Salvatore be cc&#39;d in our conversation. Please do that in the future cc to [rich@mlreno.com](mailto:rich@mlreno.com)

When will you be able to get the records I requested and the name of the person that falsely accused me of injuring them?

I appreciate you clarifying the process in front of the Board.

Will the Board have viewed all of my videos regarding Washoe County Library I have posted over the last few years? I would like to enter all of those onto the public record for any hearings.

To ensure my intentions regarding this issue are clear, Washoe County and its employees are involved in 1st Amendment retaliation. I plan on bringing an action against all involved.

Washoe County Library Facebook page has me blocked. When will I be permitted back on the Washoe County Library Facebook public forum?? I want to make some statements regarding the upcoming library taxation ballot and am unable to speak. Will this issue also be on the next agenda?

Here is a short 1 minute video, no consequences for Government employees or LGBTQ in Washoe County. Why is that Mr. Kaplan? Does Washoe DA ignore these crimes, yet punish others??

EXH 172

<https://youtu.be/4PY5mLpmQCk>

Respectfully,

Drew Ribar

Auditing Reno 911

775-223-7899

On Tue, Aug 13, 2024 at 11:03 AM Const2Audit <[const2audit@gmail.com](mailto:const2audit@gmail.com)> wrote:

Greetings Mr. Solaro,

Regarding the parody that Washoe County government has become... Violent Librarians, their Transexual friends hand in glove locking children in libraries and keeping the public and press outside....

Prior to waiving my rights... I do not waive at this time.

Please provide the procedural rules for the hearing.

EXH 173

What is the discovery process?

Provide the name of the library employee stating I harmed them.

Provide a list of people that will be giving testimony evidence on behalf of the library.

Provide all records regarding shutting down libraries and closing reading rooms to the public for Drag Queen Story time.

Provide all correspondence between the county and Our Center or any person involved with Drag Queen Story time.

Provide all exhibits the County may/will use in this case.

What will the process be to present exhibits?

Who and how will the case be presented to the board in what order will the parties present their arguments?

Can the issue of Washoe County government blocking me on social media from the library's facebook also be put on the agenda?? Library Director Scott has blocked myself and numerous other people from government operated social media/public forums. This is unconstitutional see the recent Supreme Court decision in Lindke v Freed. Recently Bonner County Idaho paid out \$125,000 for blocking a man on social media and previously Woodland Colorado got to pay \$65,000 for blocking social media... here's a little video <https://youtu.be/PJpOkeGB0xw>

My attorney Rich Salvatore will be helping me with this matter, please ensure he is cc'd in our future correspondence.

This is a discovery request for this hearing as well as a public records request under NRS 239.

Please let me know.

EXH 174

Respectfully,

Drew Ribar

Auditing Reno 911

<https://www.youtube.com/@auditingreno911>

775-223-7899

On Tue, Aug 13, 2024 at 9:06 AM <[sanshelly1@charter.net](mailto:sanshelly1@charter.net)> wrote:

CC: Commissioners, County Manager, and Library Board

I forgot to add, I am being falsely accused as well. The video evidence you are possession of clearly shows I spoke with NO patrons during DQSH and I only spoke to library staff after being approached and harassed by them.

**BROKEN (NRS) 200.510** A libel is a malicious defamation, expressed by printing, writing, signs, pictures or the like, tending to blacken the memory of the dead, or to impeach the honesty, integrity, virtue, or reputation, or to publish the natural defects of a living person or persons, or community of persons, or association of persons, and thereby to expose them to public hatred, contempt or ridicule

**BROKEN (NRS) 200.550** Every person who shall willfully state, deliver or transmit by any means whatever to any manager, editor, publisher, reporter or other employee of a publisher of any newspaper, magazine, publication, periodical or serial any statement concerning any person or corporation which, if published therein, would be a libel shall be guilty of a misdemeanor.

EXH 175

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From: <sanshelly1@charter.net>;  
To: "Solaro, David" <DSolaro@washoecounty.gov>;  
Cc: "Kaplan, Herbert" <HKaplan@da.washoecounty.gov>;  
Sent: August 13, 2024 at 8:02 AM PDT  
Subject: RE: Notice of Appeal - Library Board of Trustees - August 21, 2024

Good morning Mr. Solaro,

I appreciate your email. Thank you.

I have questions before I answer your email, please.

I don't understand why we have these NRS codes when nobody with our library system is able to abide by them. Why is the library director, staff, board and DA exempt from following the NRS codes?

**BROKEN** (NRS) 379.120 Library to be free and accessible to public; regulations of governing authority.

**BROKEN** (NRS) 200.460 False imprisonment is an unlawful violation of the personal liberty of another, and consists in confinement or detention without sufficient legal authority.

**BROKEN** (NRS) 200.571 Harassment

**BROKEN** (NRS) 233.010 It is hereby declared to be the public policy of the State of Nevada to protect the welfare, prosperity, health and peace of all the people of the State, and to foster the right of all persons reasonably to seek and be granted services in places of public accommodation without discrimination, distinction or restriction because of race, religious creed, color, age, sex, disability, sexual orientation, national origin, ancestry or gender identity or expression.

EXH 176



**BROKEN** (NRS) 241.033 to the extent that the Library Board of Trustees may “consider your character, alleged misconduct, professional competence, or physical or mental health,”.

Where is the accountability? Why aren't they held to a better standard?

Thank you,

Sandee Tibbett

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From: "Solaro, David" <DSolaro@washoecounty.gov>;  
To: <sanshellyl@charter.net>;  
Cc: "Kaplan, Herbert" <HKaplan@da.washoecounty.gov>;  
Sent: August 12, 2024 at 5:34 PM PDT  
Subject: Notice of Appeal - Library Board of Trustees - August 21, 2024

Ms. Tibbett,

I have seen correspondence related to a potential request to appeal a decision of the Library System in Washoe County before the Library Board of Trustees.

Pursuant to Nevada Revised Statutes (NRS) 241.033, to the extent that the Library Board of Trustees may “consider your character, alleged misconduct, professional competence, or physical or mental health,” you are entitled to receive notice of such meeting by certified mail at least 14 days prior to the meeting. Considering the compressed time frame, notice by certified mail is not possible. Accordingly, it is requested that you reply to this e-mail whether you would like to waive the notice requirement via certified mail and consider your return e-mail as a waiver that you understand your statutory right and that you waive the otherwise applicable notice requirement set forth in NRS 241.033. This will allow the Board to fully consider your appeal at the upcoming August 21, 2024 meeting.

EXH 177

**Please respond to this e-mail and state whether you waive your notice requirements, or whether you would rather have notice as outlined in NRS 341.033.**

Thank you in advance for your consideration.

David M. Solaro

Assistant County Manager | Community Services

[dsolaro@washoecounty.gov](mailto:dsolaro@washoecounty.gov) | Office: 775.328.3624

1001 E. Ninth Street, Building A, Reno, NV 89512

<span style="font-size:5pt;font-family:Vivaldi;color:rgb(8,118,170)">  </Span></A>

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EXH 178